

# **EMERGENCY CONTINGENCY PLAN**

## **HARRIS-THOMAS SITE DAYTON, MONTGOMERY COUNTY, OHIO**

**October 22, 2012**

The Harris-Thomas (HT) Site is located at 1400 East 1<sup>st</sup> Street in Dayton, Montgomery County, Ohio (see Attachment 1, labeled as Figure 2-1). The Site is located in a mixed residential, commercial and industrial area. The Site is bordered to the north by East 1<sup>st</sup> Street and a vacant lot beyond, to the east by Schumacher Crane Rental and BBC Converters, to the south by Service Master Clean/Angler Construction and East 2<sup>nd</sup> Street beyond, and to the west by Harshman Street and First Street Recycling beyond (see Attachment 2, labeled as Figure 2-2). Commercial and industrial businesses are located within 500 feet of the Site, and the closest residences are located within 1,000 feet south of the Site. The Mad River, which discharges into the Great Miami River, is located approximately 0.3 mile northwest of the Site. The Site contains seven separate, mostly one-story buildings (one composed of approximately eight additions) of various construction. The buildings encompass 10 areas that cover approximately 30,000 square feet on approximately 2.5 acres.

### **SITE HISTORY**

Historic records indicate that the Site has been occupied by an oil distributor (1898), metal foundries (early 1900s), boiler makers (early 1900s), painting contractors (1960s), a metal treating company (1970s), and metal forging companies (1920s to 2006). From at least 1960 to 1998, the Harris Thomas Drop Forge Company (HTDFC) owned the Site. In 1998, the HTDFC transferred the Site property to Harris-Thomas Industries, Inc., which used the Site to manufacture steel parts for the automotive and other industries. In 2006, Harris-Thomas Industries, Inc. vacated the Site.

On February 2, 2012, the Dayton Fire Department (DFD) and the Ohio Environmental Protection Agency (Ohio EPA) investigated a report of oil leaking from a Site building onto a City of Dayton right-of-way sidewalk along Harshman Street. Site trespassing and vandalism (from metal scrappers) resulted in the release of transformer oil potentially containing polychlorinated biphenyls to the Area G building, its roof, and the adjacent sidewalk. The DFD and Ohio EPA inspected the building and observed not only the oil released from transformers on the roof but also numerous abandoned 55-gallon drums, containers, and pits of unknown liquids.

On February 3 and 6, 2012, the Ohio EPA and DFD, respectively, formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a time-critical removal action.

On March 19, 2012, the DFD, Ohio EPA, and City of Dayton Division of Environmental Management responded to another transformer oil release at the Site. Trespassers had again accessed the Site property and climbed onto the roof of the Area G building. The transformer cage had been cut and removed, and one of the four remaining transformers had been tipped over, drained of oil, and stolen by the scrappers for the copper wiring inside the unit.

On February 10 and March 7, 2012, U.S. EPA conducted a site assessment at the HT Site and documented the presence of approximately 25 55-gallon drums, approximately 25 small containers (having a volume of 5 gallons or less), 10 pits containing unknown liquids, and one compressed gas cylinder. During the site assessment, U.S. EPA collected 7 liquid waste samples and 14 solid waste samples from containers, floor sweepings, wall solids, and waste piles at the

Site. Based on sample analytical results, the containers contain ignitable, corrosive, and toxic wastes. In addition, XRF readings document widespread heavy metal contamination (chromium and lead) in floor sweepings, waste piles, and wall solids throughout the Site.

U.S. EPA plans to initiate a removal action at the Site on October 23, 2012. U.S. EPA plans to undertake the following actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Secure Site with fence repair, boarding and/or locking windows and doors.
4. Inventory, sample, and perform hazard characterization, in compliance with a Site-specific QA/QC Plan, on all substances contained in drums, containers, pits, transformers and waste piles;
5. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
6. Dismantle and decontaminate process equipment and building components associated with the product process area for recycling, as necessary;
7. Consolidate and package heavy metal-contaminated floor sweepings and wall solids for transportation and off-site disposal; and
8. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

## **HOURS OF OPERATION**

When the removal begins, U.S. EPA crews will be on Site Monday through Friday (0800 to 1800 hours). A security guard will be on Site during non-working hours and stationed in an office trailer. A copy of the Emergency Contingency Plan will be available on Site, if needed.

## **ADDITIONAL INFORMATION**

U.S. EPA has posted the following website for further information:

**<http://www.epaossc.org/harristhomassite>**

In the event of a required response by local emergency authorities during site removal activities, the following protocols provide necessary guidance for the following potential response events:

**Vandalism/Trespass;**

**Medical Emergencies; and**

**Fire/Explosion**

## **VANDALISM/TRESPASS**

In the event of vandalism/trespass at the Site, the Dayton Police Department (DPD) will respond to the U.S. EPA Command Post office trailer (located inside the perimeter fence along East 1<sup>st</sup> Street). Attempts will be made by the law enforcement to communicate with the offenders from the site perimeter via loudspeaker and to apprehend the offenders following their exit from the

building. Members of the DPD should wear gloves or immediately wash their hands following apprehension of the offenders. The DPD and/or the on-site security guard will immediately advise U.S. EPA OSC Steve Renninger of any incidents of trespass or vandalism.

### **MEDICAL EMERGENCIES**

Rescue operations inside the building, if necessary, should be conducted by personnel wearing Level D personal protective equipment with disposable latex booties. The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum emergency decontamination should be completed. If possible, decontamination and removal of injured personnel from the exclusion zone will be conducted prior to arrival of emergency medical services (EMS). EMS will pick up injured personnel at the U.S. EPA Command Post office trailer.

For emergencies requiring transport to a hospital, **911** will be called. The victim should be transported to Miami Valley Hospital, located at 1 Wyoming Street, Dayton, Ohio, **(937) 208-2440** (2.4 miles). A map showing directions to the hospital from the site is included as Attachment 3.

### **FIRE/EXPLOSION**

To activate fire department resources, the Dayton Fire Department dispatcher will be notified by calling **911**. In addition, U.S. EPA OSC Steve Renninger will be contacted on his cell phone at (513) 260-7849.

During a hazardous materials incident, law enforcement will control perimeter access; however, they are not equipped with protective clothing and their main function will be site control and preventing unauthorized persons from entering the hazard area. Law enforcement should not enter the exclusion zone (i.e. the building).

The fire department when called out to the scene of a hazardous materials emergency has the duty and responsibility to save lives, prevent injuries, reduce property loss, and to restore vital services. Command of the emergency will be established by the officer of the first arriving fire company. The command will be transferred utilizing fire department staff, under the Incident Command System. The Fire Chief will be in charge of the incident until such time that he relinquishes that authority.

Telephone numbers of personnel who should be contacted in the event of an incident are listed on the attached page. At a minimum, the following personnel will be notified;

U.S. EPA On-Scene Coordinator	Steve Renninger
Dayton Fire Department	Andrew Steele
Dayton Regional Hazmat	Denny Bristow

In the event of heavy smoke or toxic gas emission, the fire department may initiate "shelter-in-place" of the neighboring areas. If this is necessary, it should proceed according to Montgomery County EMA Guidelines. U.S. EPA's START contractor will also be available to assist with perimeter air monitoring.

**LIST OF CONTACTS  
HARRIS-THOMAS SITE  
DAYTON, MONTGOMERY COUNTY, OHIO**

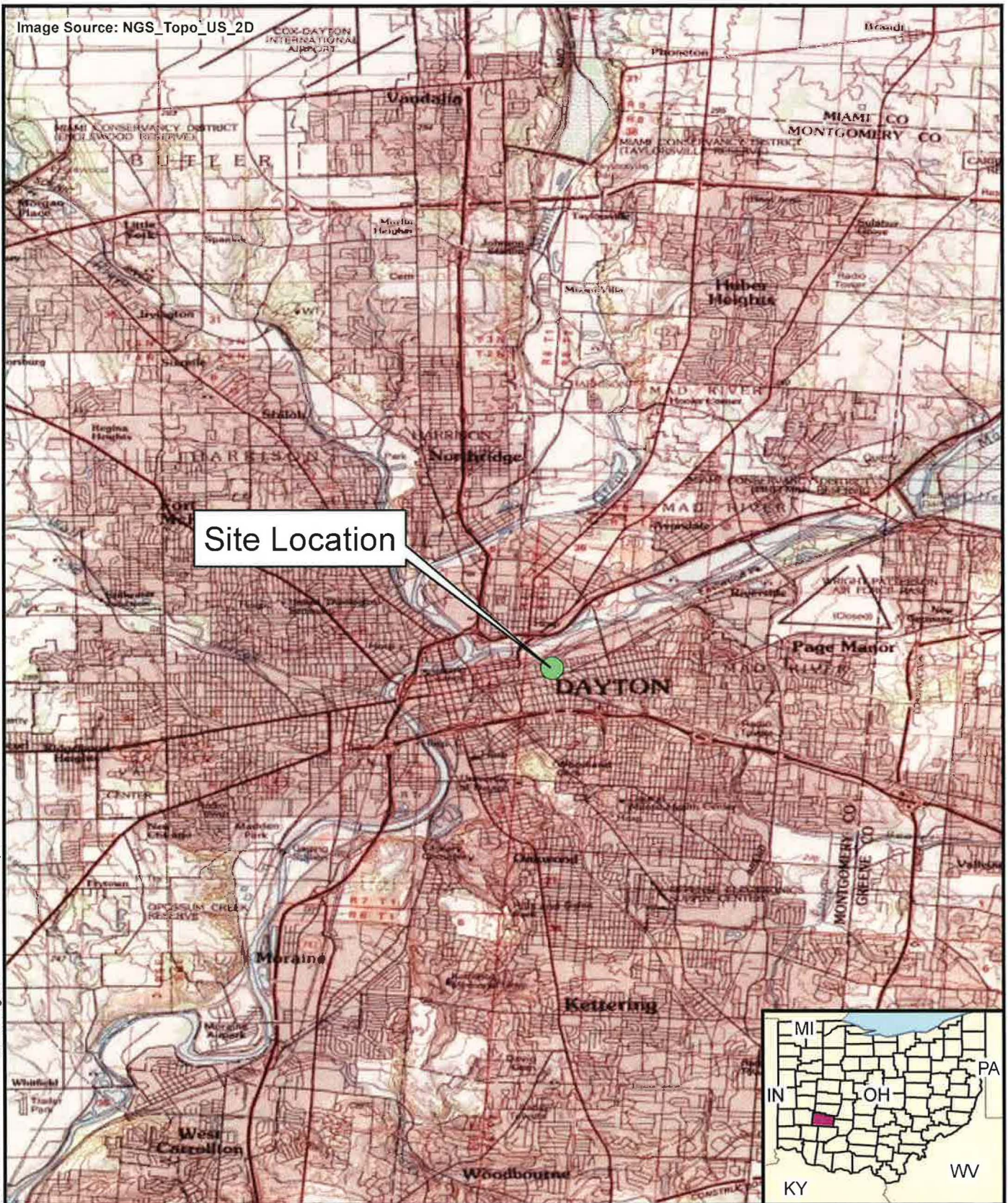
<b><u>LOCAL AGENCY</u></b>	<b><u>PHONE#</u></b>	<b><u>CONTACT</u></b>
Dayton Fire Department	911 937-333-FIRE 937-333-4522	Emergency Dispatcher  Andrew Steele
Dayton Police Department	911	Emergency Dispatcher
Dayton Regional Hazardous Materials Response Team	937-512-5103 office 937-901-5112 cell	Denny Bristow
Montgomery County EMA	937-224-8936	Jeffery Jordan
Montgomery/Greene County LEPC	937-531-6548	Mathew Lindsay
Miami Valley Hospital	937-208-2440	
<b><u>FEDERAL/STATE</u></b>		
U.S. EPA On-Scene Coordinator	<b>(513) 260-7849 cell</b>	<b>Steve Renninger</b>
Ohio EPA (Division of Hazardous Waste Management)	(937) 285-6070	Jeff Smith
U.S. EPA Region 5 Response (Emergency only)	(312) 353-2318	(24-hour # that rings in Chicago or Detroit and can assist or locate the OSC)
National Spill Response Center	<b>(800) 424-8802</b>	24-hour Spill Reporting
Ohio EPA Environmental Response	<b>(800) 282-9378</b>	24-hour Spill Reporting
<b><u>COMMAND POST PHONE NUMBERS</u></b>		
Weston START	(513) 703-3092 cell (937) 313-5620 cell	John Sherrard Weston Emer. Resp. Phone
Environmental Quality Management (ERRS)	(513) 543-3909 cell (513) 314-3503 cell	Steve Letany – Resp. Mgr Tyrone Price – Cost Acct.

**ATTACHMENT 1**

**SITE LOCATION MAP**



Image Source: NGS\_Topo\_US\_2D



0 2 Miles



Prepared for:  
U.S. EPA REGION V  
Contract No.: EP-S5-06-04  
TDD: S05-0001-1202-004  
DCN: 1736-2A-AVHO



Prepared By:  
WESTON  
SOLUTIONS, INC  
4710-A Interstate Drive  
Cincinnati, Ohio 45246

**Figure 2-1**  
Site Location Map  
Harris-Thomas Industries Site  
Dayton, Montgomery County, Ohio



**ATTACHMENT 2**  
**SITE LAYOUT MAP**

Image Source: Ohio EPA

E 1ST ST



CRANE ST

HARSHMAN ST

E 2ND ST

### Legend

-  A - Tool Crib
-  B - Die Forging
-  C - Storage Shed
-  D - Steel Stock
-  E - Forge Shop
-  F - Cleaning Room
-  G - Die Shop / Shipping
-  H - Locker Room
-  I - Press Shop
-  J - Offices
-  Shed
-  Transformer
-  Site Boundary

0 70  
Feet



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**Figure 2-2**  
Site Layout Map  
Harris-Thomas Industries Site  
Dayton, Montgomery County, Ohio



**ATTACHMENT 3**  
**HOSPITAL ROUTE MAP**



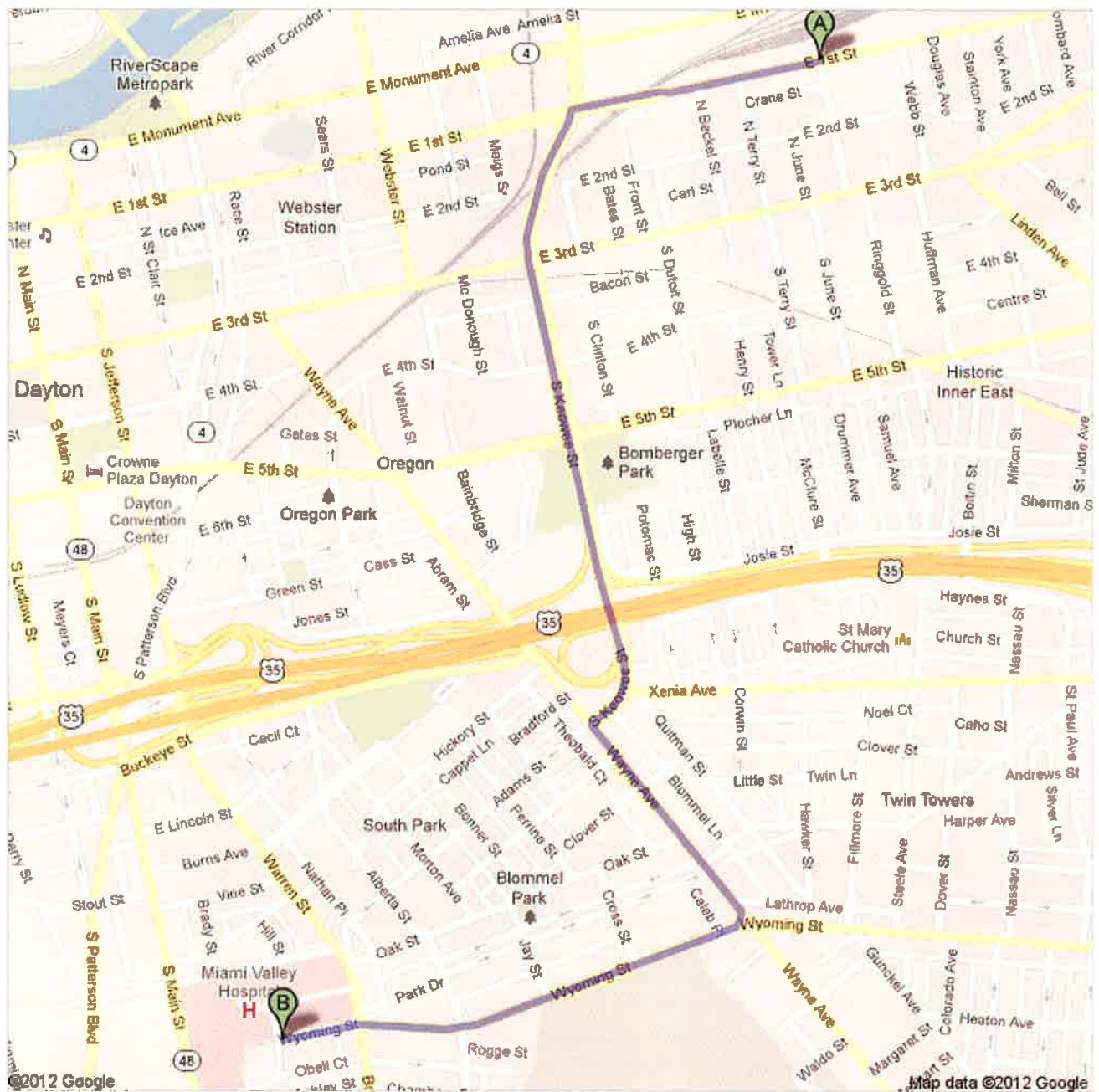
### Directions to 1 Wyoming St, Dayton, OH 45409

2.4 mi – about 8 mins

HOSPITAL ROUTE MAP

HARRIS-THOMAS SITE

OCTOBER 2012





1400 E 1st St, Dayton, OH 45403

- 
- |  |                           |
|--|---------------------------|
| 1. Head <b>west</b> on <b>E 1st St</b> toward <b>N Terry St</b>  | go 0.4 mi<br>total 0.4 mi |
|  2. Turn left onto <b>N Keowee St</b><br>About 4 mins                                     | go 1.0 mi<br>total 1.3 mi |
|  3. Turn left onto <b>Wayne Ave</b><br>About 1 min  | go 0.4 mi<br>total 1.7 mi |
|  4. Turn right onto <b>Wyoming St</b><br>Destination will be on the right<br>About 2 mins | go 0.7 mi<br>total 2.4 mi |



1 Wyoming St, Dayton, OH 45409

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These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2012 Google

Directions weren't right? Please find your route on [maps.google.com](http://maps.google.com) and click "Report a problem" at the bottom left.